Chapter 4: Monitoring the Program

Table 6. SEP Monitoring At-A-Glance (4-1)

Goals and Objectives (4-3)

DOE Headquarters
Monitoring RSOs (4-3)

RSOs Monitoring
State Energy Offices (4-4)

States Monitoring State-Implemented Projects (4-8)

States Monitoring Contractors/
Subrecipients (4-9)

Table 6. State Energy Program Monitoring At-A-Glance

A successful monitoring plan identifies potential problems, improves projects and programs, and promotes the exchange of information and methods.

Monitoring is conducted two ways: on-site visits and desk monitoring. Desk monitoring includes on-going programmatic review that includes oversight activities and reviews of quarterly progress and financial reports. Note: All monitoring procedures are currently being reviewed by DOE Headquarters.

Monitoring Levels	DOE Headquarters Monitors RSOs	RSOs Monitor State Energy Offices	States Monitor Subrecipients	States Monitor State- Implemented Projects
Pre-Visit Tasks	 Review Implementation Status Reports, WinSAGA data, and other communications. Arrange orientation meeting with RSO director and others. Send written confirmation of meeting to RSO. Conduct discussions. Review State Plan. 	 Prepare monitoring plan. Determine projects to be monitored. Enter visit in WinSAGA. Establish monitoring team. Review appropriate documents. Prepare list of concerns and special considerations. Prepare a checklist. Notify state in writing. Call to confirm meeting. 	 Establish a monitoring team if necessary. Review contract. Review subrecipient's file. Prepare list of questions and special considerations. Prepare monitoring checklist. Notify subrecipient in writing. Call for meeting confirmation. 	N/A
On-Site Visit Tasks	 Review grant administration. Verify RSO knowledge of State projects and State's current situation. Verify technical assistance to States and project duplication to other States. Verify program goals and objectives are being met. Exit meeting the RSO director that includes recommendations. 	 Hold orientation meeting. Hold daily monitoring meetings. Review administrative procedures. Review financial procedures. Review programs and accomplishments. Determine need for technical assistance. Prepare exit report. Hold exit conference. 	 Hold orientation meeting. Review contract. Review the administrative procedures. Review accomplishments, work products, and equipment. Review financial procedures. 	N/A

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Monitoring Levels	DOE Headquarters Monitors RSOs	RSOs Monitor State Energy Offices	States Monitor Subrecipients	States Monitor State- Implemented Projects
Post-Visit Tasks	 Summation with program manager. Review recommended actions. Post-visit briefing with SEP director. Trip report with follow-up, as appropriate. 	 Brief RSO director on trip. Prepare detailed trip report. Identify areas for future monitoring. Report findings and corrective actions to the State. Review and evaluate State's response. Send letter of acceptance to State. Enter information into WinSAGA. 	 Write a trip report. Identify areas for future monitoring. Send the subrecipient a copy of report. Review subrecipient's response. Clarify unresolved issues. Send subrecipient letter of acceptance. 	N/A
Desk Monitoring	Review RSO reports Review WinSAGA data entries.	Review reports. Update data in WinSAGA. Maintain communication with State Energy Office by telephone.	 Establish a filing system. Document all correspondence. Rank projects. Begin monitoring contract before it is half completed. Review financial and progress reports. 	Assess financial records. Compare accomplishments with milestones. Assess overall success of program before program is halfway completed. Determine if targeted audience was reached. Review marketing strategies. Review deliverables. Evaluate need for technical assistance.

Chapter 4: Monitoring the Program

Federal regulations require recipients to monitor each project, program, subaward, function, or activity supported by an award to ensure compliance with Federal reporting requirements and that performance goals are being achieved. This chapter contains SEP monitoring procedures established by DOE Headquarters in 1992. However, DOE is reviewing all monitoring procedures and States should check with RSOs for the most current procedures.

Goals and Objectives

See 10 CFR 600.151 and 10 CFR 600.240 Monitoring and reporting program performance at www.access.gpo.gov/nara/cfr/waisidx/10cfr600_99.html

The overall objective of monitoring activities is to help program administrators achieve project goals and follow applicable regulations. All monitoring can be divided into three major categories: administrative, financial, and programmatic. Administrative monitoring evaluates the management system and provides adequate program oversight. Financial monitoring involves reviewing records to ensure accurate fiscal record keeping. Programmatic monitoring compares accomplishments with milestones to make sure the projects are completed on time and within budget. These three areas are routinely reviewed for compliance and to determine if any changes can be made to improve the efficiency and effectiveness of the program.

A successful monitoring plan helps identify potential problems and improve projects and the program at every level. Program monitoring also promotes the exchange of information and methods among States with similar projects underway. This type of information sharing exists throughout the system, from DOE Headquarters to subrecipients, and helps promote the use of new technologies for generating or saving energy. By providing a feedback loop, monitoring helps identify instances when some outside help or technical assistance may be needed.

DOE Headquarters Monitoring RSOs

DOE Headquarters is responsible for the oversight and operation of the SEP. It is also responsible for establishing monitoring policy and procedures, reviewing and assessing RSO administration of the program, and providing technical assistance and training, as appropriate. The goal is to administer the program consistently throughout the nation and coordinate it with other Federal programs.

DOE Headquarters staff reviews the WinSAGA reports, and looks for opportunities to provide technical assistance. The staff also makes an annual monitoring visit to each RSO. During the visit, the staff reviews the SEO performance and, as appropriate, with RSO personnel, visits a SEO or a specific State project. The on-site visit will also cover:

- Grant administration, focusing on how the RSO administers the program.
- Depth of RSO knowledge of State projects.
- Knowledge of State focusing on the energy situation of the State and the role of the RSO in supporting the State's plan.
- Technical assistance to States and transferability of State projects, focusing on projects or technologies that can be duplicated in other States.
- Goals and objectives, focusing on whether the established goals and objectives are being met.

Following the monitoring visit, Headquarters staff brief the program director on any findings. The staff prepares a monitoring trip report summarizing the visit and makes a copy of the report available to the RSO and to appropriate DOE personnel.

The following steps are recommended to prepare for the monitoring visit, during the visit, and post-visit follow-up:

- Review WinSAGA reports and other communications as appropriate before the trip.
- Send a written confirmation of the meeting to the RSO with areas that will be covered.
- Arrange an orientation meeting with RSO director and others, as appropriate.
- Conduct discussions with program manager, contracting officer, financial chief, and others as appropriate.
- Review the State Plan.
- Summation with program manager.
- Recommended actions.
- Exit meeting with RSO director.
- Post-visit briefing with program director.
- Trip report with follow-up, as appropriate.

RSOs Monitoring State Energy Offices

The main purpose of the RSOs monitoring SEOs is to maximize the effectiveness of SEP activities and to ensure compliance with applicable regulations. Administrative and financial monitoring also ensures projects are on track and on schedule. Monitoring provides an opportunity to communicate with the States and learn about ways the RSOs can help the States be more effective. The monitoring visit should recognize successes, special problems, and the need for technical assistance. It also should identify solutions and lead to corrective action. When the monitoring visit is over, the monitor passes on the information and data gathered during the visit to DOE Headquarters.

DOE Headquarters' SEP Guidance requires RSOs to perform at least one formal site visit to each State per year unless the State requests an exception. RSOs may

add more detailed project site visits if needed. For example, an RSO may want to observe a State monitoring a subrecipient, or review the procedures of a problem subrecipient. The RSO can modify, with justification, the standard schedule of one annual visit to each SEO. However, the modification requires prior concurrence of DOE Headquarters.

Desk monitoring reinforces the annual on-site monitoring visit because it periodically reviews the status of projects and activities included in the State Plan and assesses the financial status of the program in that State. Desk monitoring includes reviewing the quarterly reports and may require RSOs to contact SEOs to question why milestones are behind schedule, obtain more information about major accomplishments to highlight the activity for DOE Headquarters, determine the reason for a low expenditure rate, inquire if technical assistance is needed in a certain area, or offer suggestions that are project-specific so valuable information can be shared.

Pre-Visit Review

The pre-visit review is a key ingredient to a successful monitoring trip. First, the RSO develops a monitoring plan and determines which programs and projects to review. The RSO makes sure that the plan is comprehensive enough to cover all aspects of the State's program activities and verifies that the State is complying with program requirements. This is much easier if the State Plan includes detailed and verifiable milestones. If the site visit includes both program and financial reviews, the RSO usually establishes a monitoring team that coordinates its activities at a planning meeting. At a minimum, RSO monitors should review the following documents:

- The most recent monitoring visit report and correspondence with the State.
- The most recent quarterly progress and fiscal reports for the year to be monitored.
- The most recent Master File.
- The program and project files for the programs to be monitored during the visit.

RSO Pre-Visit Tasks

- Prepare a monitoring plan.
- Determine the programs and projects to be monitored.
- Enter the planned visit into WinSAGA.
- Establish a monitoring team, if necessary.
- Review appropriate documents.
- Prepare a list of concerns, unresolved issues, and special considerations.
- Prepare (or locate) a checklist appropriate for the programs being monitored.
- Notify the State in writing.
- Call to confirm the meeting.

Before the visit, RSOs should prepare a list of concerns or any unresolved issues and notes any special items. For example, some States have unique purchasing requirements. The monitoring plan should outline the monitoring methods that the RSO plans to use during the site visit. The plan should answer the questions "who, what, where, why, how, and when?"

Once the RSO has developed a monitoring plan, a detailed checklist should be prepared for use during the monitoring visit. The checklist should provide for responses beyond "yes" and "no" answers. The RSO must gather enough information to review, evaluate, and support the conclusions.

Next, the RSO notifies the SEO of the upcoming visit in a letter, and describes the breadth and scope of the review. The RSO should list specific projects, activities, sites, and materials to be included. The RSO also needs to notify the SEO about the monitoring methods to be used and include a copy of the monitoring checklist. The notification should give the SEO at least 30 days to prepare the requested material for the visit.

Monitoring Visit

Monitoring visits should start with an orientation meeting involving the monitor, the SEO director, and the SEP manager. This allows the RSO monitor a chance to get to know the State personnel. The monitor should try to develop good communication and a cooperative working relationship. At the meeting, the monitor reiterates the goals and objectives of the monitoring trip, as established in the notification letter, and discusses the goals of the State's programs.

The orientation meeting is a good time to gather general information for the monitoring report and decide on the time of the exit conference at the end of the monitoring visit. At the meeting, RSO monitors can examine the State's organizational structure. Changes in management of the programs being reviewed can substantially affect the programs. The meeting is also a good time for RSO monitors to find out who is responsible for specific tasks and to gain familiarity with SEO reporting structures.

Monitoring visits typically last from 1 to 3 days. If a team concept is used, the monitoring team should meet privately at the end of each day to discuss its activities and plans for the next day and make necessary adjustments. If the monitor suspects waste, fraud, or abuse, the RSO director should be notified as soon as possible. The director can help the monitor develop a strategy for dealing with the problem, and, in some cases, can implement a solution before the exit conference.

A comprehensive annual review may include administrative, financial, and programmatic areas. The administrative review evaluates the management system, the financial review examines business operations and accounting practices for all sources of funds, and the programmatic review takes a look at the State plan. The financial review ensures that procurement, payroll, and contracting procedures meet State requirements and have sufficient documentation to comply with regulations. The RSO monitor should also ensure the State's equipment and property are properly tracked and valued through a

reliable inventory system. Also, the State's financial records must be properly maintained and accurate.

The programmatic review evaluates the implementation of the approved plan, comparing actual accomplishments to milestones and the latest quarterly report. The RSO monitor reviews the program files, interviews project managers, and checks whether the SEOs monitoring of subrecipients matches the monitoring section of the State Plan. The RSO reviews the State monitoring checklists and if possible, accompanies State personnel on a monitoring visit. Finally, the RSO monitor obtains copies of documents to support the conclusions and findings.

With the exception of suspected waste, fraud, or abuse, the RSO monitor should discuss any review findings with State personnel. The monitor should also discuss ideas and recommendations with State personnel and ask if there are procedures or processes that DOE can improve on.

Once the review is completed, the RSO monitor creates a list of program strengths and weaknesses in preparation for the exit conference. The monitor also prepares a list of corrective actions and helps develop a plan for implementing the improvements. The monitor should be prepared to document review findings and listen to the State's reaction to its recommendations. The monitor then determines if a follow-up visit is required.

RSO Monitoring Visit Tasks

- Hold orientation meeting.
- Hold daily monitoring team meetings (if a team is used).
- Review administrative procedures.
- Review financial procedures.
- Review programs and accomplishments.
- Determine need for DOE assistance.
- Prepare exit report, including strengths and weaknesses.
- Hold exit conference

Post-Visit Review

Following the site visit, the monitor briefs the RSO director and prepares a detailed report on the results of the monitoring trip for the RSO's files, identifying areas that need review during future visits. The monitor then sends a report to the SEO, detailing the findings and the implementation plan for corrective action. This report must be sent by the RSO within 30 days of the site visit and must specify how long the State has to respond.

After the State responds to the report, the RSO accepts or rejects the State's response. If the response is rejected, further negotiations and correspondence are required. If after the second notice the State fails to respond, the RSO sends another notice of the findings. If the State still does not respond or refuses to comply, the RSO can consider initiating remedial actions contained in the DOE

Financial Assistance Rules (10 CFR Part 600.243). Once the RSO accepts the State's response, it sends the State a final letter of acceptance.

Chapter 5 provides information on WinSAGA

After completing the post-visit review, the RSO monitor enters the review data into WinSAGA. The findings are also included in a Status Report to DOE Headquarters.

RSO Post-Visit Tasks

- Brief the RSO director on the trip.
- Prepare a detailed trip report.
- Identify areas for future monitoring.
- Report the findings and corrective action to the State.
- Review and evaluate the State's response.
- Send a letter of acceptance to the State.
- Enter the trip information and data into WinSAGA.

States Monitoring State-Implemented Projects

Chapter 3 discusses these reports in more detail. Sample forms can be found in Appendix C.

Although the only formal requirements for States monitoring State-implemented projects are the quarterly reports: the Project Status Report (EIA-459F), the Financial Status Report (SF-269), the Federal Cash Transactions Report (SF-272), and the annual Energy Savings Report (CE-462), States should monitor their projects as they monitor a subrecipient's to assess program quality and increase program success and effectiveness. To monitor their projects, States can follow the same general monitoring procedures the RSOs use, including the checklists. States may skip over questions that do not apply, but should concentrate on the questions that assess program quality.

First, states should develop project monitoring plans that initiate monitoring procedures before the projects are halfway completed; in other words, before half the budget is spent, half the period of performance has passed, or half the number of milestones are completed. This gives States an opportunity to make corrections when they can still affect the projects. It also helps States determine if their projects will achieve the anticipated energy or dollar savings. If not, States should determine why the projects will fall short and consider whether they need to change estimates on other projects or future installations.

Second, States should assess their financial records to see if the expenditures are in line with the proposed budget. If not, States need to determine what they can do to bring their projects back on track. Third, States should make sure their projects are still on schedule and in line with their overall goals by comparing the actual accomplishments with the milestones.

In addition to reaching energy- and dollar-saving goals, States should determine whether they reached their intended audience. They should consider not only the number of people reached, but also whether they were effective in the target sector. States should also review their marketing efforts to determine if they

were appropriate for the audience the States were trying to reach and if there are other sectors that could benefit from this project.

Next, States should review all the deliverables. They may want to hire or select a third, more objective party for this task. States should give the party an overview of the project, describing the project goals, intended audience, and outcomes. This third party can then review the deliverables, such as project literature, brochures, and workshop materials, and provide suggestions. States can also gain input by interviewing clients served by their project and developing evaluation forms that participants can fill out anonymously.

Finally, States should evaluate their need for technical assistance. States with similar projects may have confronted similar problems. The SEP manager at the appropriate RSO may be able to provide assistance or information.

States Monitoring Contractors/ Subrecipients

This section provides guidance to the States on how to monitor their subrecipients. Subrecipients include nonprofit agencies, for-profit companies, local governments, and other State agencies. Such a diverse group results in an equally diverse list of funding arrangements including grants, loans, contracts, letters of understanding, and interagency agreements. The funding arrangement depends on the nature of the project and the subrecipient. Therefore, each State is encouraged to develop subrecipient monitoring that is most suitable for its unique program environment. States are also encouraged to contact other States and their RSOs in the process of formulating their monitoring strategies. The strategies included in this manual comprise only a small fraction of what has been successful.

The main purpose of monitoring these subrecipients is to maximize the effectiveness of the projects. States must make sure subrecipients meet the terms and conditions of the agreement and that the project remains on schedule and within the budget. They need to check the quality of the work as well as the quantity and timeliness. States must hold the subrecipients responsible for any subcontractors who must meet the terms of the agreement.

DOE recommends that SEOs perform at least one site visit during the life of each project. For large or high-cost projects, States may want to perform several site visits. Some States create a list of projects and develop a ranking system to determine how to allocate their monitoring resources. Although some States only provide limited monitoring, others devote several full-time staff members to monitoring every project twice a year.

In addition to the formal monitoring visits, the quarterly reports mentioned in Chapter 3 are required for these projects as well. Some States may require their subrecipients to submit monthly status reports and financial statements.

Contract Monitoring

See 10 CFR 600.147 and 10 CFR 600.148

After States select a subrecipient for a project and finalize the contract, they need to continually monitor the contract. The first step is to hold an orientation meeting before any of the work begins. States can avoid a lot of confusion if

they meet with new subrecipients to explain exactly what they expect of them. This is not a session for further contract negotiations. The orientation meeting is a good time to provide copies of the reporting forms the subrecipients will need for the life of the project or at least for the first year and to show subrecipients how to fill out the reports the SEO requires. States can also give the subrecipient a copy of the monitoring checklist or criteria they plan to use on their site visits (described in the Pre-visit Review section). If properly conducted, this orientation meeting can save work for both the State and the subrecipient.

The next step for a new contract is developing a good set of project files to accurately track the different aspects of the project. One successful format divides project files into two categories: a working file and a documentation file. Dividers may have the following labels:

Working File

Documentation File

Contract/Checklist Contract Negotiations/Development

General Correspondence Work Products
Telephone Logs Public Relations
Memorandum Miscellaneous

Financial Reports Correspondence

Quarterly Reports/Correspondence Monitoring/Evaluation/Closeout

Filing systems may differ from this, but States should develop and consistently use a system.

After the filing system is established, States should document all correspondence regarding the project. Telephone logs should be kept to record dates and topics of conversations. States should keep memoranda, correspondence, and monitoring and quarterly reports in the working file for easy access.

Desk monitoring is an essential part of the ongoing monitoring process. States should review the monthly report of expenses, and if they find errors, contact the subrecipient for clarification. States should "flag" projects with unresolved issues until they are corrected. If the subrecipient is more than 10 business days late sending a report, States should send a reminder notice. The contract should state the allowable amount of flexibility. For example, some States use a limit or "significant variance" of 20% for budget items or two months behind schedule as the trigger that requires correction.

The ongoing desk monitoring, combined with a State's ranking system for monitoring, will also help States determine the appropriate time for an on-site visit. If the State only plans one monitoring trip, then the best time to monitor the contract is usually a little before the contract is half completed. Some States wait until the project is in the second or third quarter of the first year. The proper time to monitor varies with different projects. But the main consideration is that

States monitor the project early enough so the project can benefit from any changes implemented and late enough that there is activity to measure.

Other situations that may necessitate a monitoring site visit include the nature of the project or a significant problem. Some projects, such as a series of workshops, can only be accurately monitored by sending someone to observe the subrecipient in action.

Other projects may have a significant deficiency that forces a visit, such as misuse of funds, continual performance problems, or noncompliance with Federal or State regulations.

SEO Contract-Monitoring Tasks

- Hold an orientation meeting.
- · Discuss expectations and requirements.
- · Provide reporting and monitoring checklists.
- Set up project files.
- · Perform ongoing desk monitoring.

Pre-Visit Review

State monitors should prepare for a formal monitoring site visit with a pre-visit review. If the monitoring trip includes more than one person, the monitoring team should hold a meeting to coordinate activities.

The State monitor can prepare for the trip by reviewing all financial and program records, quarterly and monthly status reports, invoices, and correspondence and phone logs. The monitor must fully understand the subrecipient's project, activities, and performance history before the monitoring trip. From this project review, the monitor creates a list of questions and concerns specific to this project and identifies any records or work products that need to be reviewed during the site visit. The monitor can include these special considerations in a generic monitoring checklist that provides for responses beyond "yes" and "no" answers. The monitor must gather enough information to review, evaluate, and support conclusions. A good monitoring checklist includes the following topics:

- Program management.
- Program operation and milestone achievements.
- Financial operations.
- Procurement systems.

Next, the monitor should notify the subrecipient of the monitoring visit, identify the participants that should meet during the visit, and establish a time, date, and place for the meeting. The monitor and subrecipient should allow a minimum of 2 hours for the meeting, although it could run considerably longer if the meeting involves several people or if they need to inspect several work products or a lot of equipment. The monitor should send the subrecipient a written confirmation

of the meeting, preferably 1 month before the meeting and may want to include its list of criteria or a copy of the monitoring checklist. The monitor should call the subrecipient 1 week before its visit to confirm the meeting.

SEO Pre-Visit Tasks

- Establish a monitoring team if necessary.
- Review the subrecipient's file.
- Prepare a list of questions and special considerations.
- Prepare (or locate) a monitoring checklist.
- Notify the subrecipient in writing.
- Call for meeting confirmation.

Monitoring Visit

The monitor should begin the visit by discussing the purpose and agenda of the monitoring visit. This is a good time to talk about any organizational changes for the subrecipient. (The monitor may want to get a copy of the company's organizational chart.) The monitor should interview the subrecipient using the list of prepared questions, let the subrecipient do most of the talking, and listen for any discrepancies with the information received in the progress reports.

The monitor should discuss the project accomplishments versus milestones, personnel responsibilities, and previously identified problem areas. The monitor should also determine whether the project is reaching the target audience and should assess the subrecipient's need for technical assistance or training.

Next, the monitor should inspect work products and equipment purchased with project funds. The monitor should take photographs for the project files if the project is unique or if photographic documentation is necessary. If equipment was purchased for the project, the monitor should inspect it carefully to determine that it is the equipment specified in the contract and approved by the SEO and DOE.

The financial management monitoring also should be based on a list of questions prepared during the pre-visit review. The monitor should interview subrecipients about their accounting process, audits, property management procedures, procurement practices, and records. He or she should try to determine if there is proper segregation between procurement, purchasing, and receiving. The monitor should review time sheets for accuracy and be sure the hours correspond to the proper tasks. He or she should check to see if billings are processed properly.

Once the review is completed, the monitor should discuss any areas of concern and the need for technical assistance, training, or any changes in scope needed for the contract. The monitor should then summarize both the follow-up activities and the necessary corrective actions and tell the subrecipient when to expect a copy of the report, explaining the subrecipient's review and comment opportunities.

SEO Monitoring Tasks

- · Hold an orientation meeting.
- Review the administrative procedures.
- · Review accomplishments, work products, and equipment.
- Review financial procedures.
- Hold exit meeting

Post-Visit Review

After the monitoring visit, the monitor should review the information and write a report on the results of the monitoring trip, including recommendations for future monitoring and special considerations. The monitor may want to send copies of the draft to the subrecipient with a letter reminding the subrecipient of any follow-up work, deadlines, or corrective action. The monitor must also provide instructions on when the State expects a response and if the response should be verbal or written.

After the subrecipient responds to the report, the monitor reviews the comments and provides any clarification necessary to finalize the report. If the monitor and subrecipient cannot reach an agreement about an issue, the subrecipient may have to rely on a grievance process. However, if all issues are resolved, the monitor sends a letter acknowledging acceptance of corrective action.

SEO Post-Visit Tasks

- Write a trip report.
- · Identify areas for future monitoring.
- Send the subrecipient a copy of the report (optional).
- Review subrecipient's response.
- · Clarify any unresolved issues.
- · Send subrecipient letter of acceptance.

Closeout of Completed Contracts

States will want to establish a system for the formal closeout of completed contracts. Approximately 1 month before the end of the project, States should notify the subrecipient by mail of the pending closeout. They should also send the subrecipient a list of the documents they need to close out the grant. Developing a closeout checklist is helpful. Once the subrecipient returns the checklist and any required documents, it is routed to the fiscal officer who releases final payment. Next, States should send the subrecipient a final notice of project closeout to be signed and returned. The notice should include information on equipment disposition and records retention. Filing the final notice will officially close the grant or contract.

SEO Closeout Tasks

- Send notice of closeout. Prepare closeout checklist. File signed final notice for official closeout.